IN THE UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF WASHINGTON

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JOINT STIPULATION FOR AN EXTENDED BRIEFING SCHEDULE ON PREMERA BLUE CROSS'S MOTION TO DISMISS AND FOR SUMMARY JUDGMENT- 1

## AT SEATTLE

TRISTAN FORD, Case No. 2:17-cv-01738

Plaintiff,

PREMERA BLUE CROSS.

Defendant.

Case 140. 2:1/-cv-01/30

JOINT STIPULATION TO EXTEND BRIEFING SCHEDULE FOR PREMERA'S RULE 12(B)(6) AND RULE 56 MOTION

THE HONORABLE MARSHA J. PECHMAN

NOTE ON MOTION CALENDAR: DECEMBER 11, 2017

Plaintiff Tristan Ford ("Plaintiff") and Defendant Premera Blue Cross ("Defendant", and collectively with Plaintiff, the "Parties") hereby stipulate as follows:

- 1. WHEREAS, on December 7, 2017 Defendant filed a motion for dismissal and for summary judgment ("Motion").
- 2. WHEREAS, the Parties wish to have additional time to brief the relevant issues in Premera's December 7, 2017 motion, the Parties hereby stipulate to the following briefing schedule, or similar dates that are convenient to the Court:

Note Date for the Motion: January 12, 2018;

Last date to file Opposition: January 8, 2018;

Last date to file Reply: January 12, 2018.

3. WHEREAS, there have been no previous modifications to the proposed briefing

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schedule for the Parties' Motions for Summary Judgment. 1 THEREFORE, the Parties jointly and respectfully request that the Court adopt the 2 Stipulated Briefing Schedule as may also be convenient for the Court. 3 IT IS SO STIPULATED. 4 5 Law Offices of James W. Talbot, PLLC Kilpatrick Townsend & Stockton LLP 6 7 By s/Gwendolyn C. Payton 8 By s/ James W. Talbot Gwendolyn C. Payton, WSBA No. 26752 James W. Talbot, WSBA No. 22082 9 gpayton@kilpatricktownsend.com jim@jwtalbotlaw.com Address: 1420 5th Avenue, Suite 3700 500 Yale Avenue North 10 Seattle, WA 98101 Seattle, WA 98109 Telephone: 206.467.9600 Telephone: 206.905.7717 11 Fax: 206.623.6793 Fax: 206.319.4521 12 Attorneys for Defendant Premera Blue Attorneys for Plaintiff Tristan Ford 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27

JOINT STIPULATION FOR AN EXTENDED BRIEFING SCHEDULE ON PREMERA BLUE CROSS'S MOTION TO DISMISS AND FOR SUMMARY JUDGMENT- 2

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## **ORDER**

Pursuant to the foregoing stipulation, and for good cause shown, the briefing schedule for Defendant Premera's Motion to Dismiss and for Summary Judgment are set as follows:

Note Date for the Motion: January 12, 2018

Last date to file Opposition: January 8, 2018

Last date to file Reply: January 12, 2018

IT IS SO ORDERED.

Dated this <u>/2</u> day of <u>/2.</u>, 2017.

HONORABLE MARSHA J. PECHMAN United States District Court Judge

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## **CERTIFICATE OF SERVICE**

I certify that on December 11, 2017, I caused to have served a true and correct copy of the foregoing JOINT STIPULATION TO EXTEND BRIEFING SCHEDULE FOR PREMERA'S RULE 12(B)(6) AND RULE 56 MOTION on the following by the method(s) indicated below:

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CM/ECF Delivery
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Attorneys for Plaintiff Tristan Ford

DATED this 11th day of December, 2017, at Seattle, Washington.

Kilpatrick Townsend & Stockton LLP

s/ Gwendolyn C. Payton

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